

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

THE HALE FOUNDATION, INC.,

Petitioner and Plaintiff,

v.

AUGUSTA-RICHMOND COUNTY,
GEORGIA, et. al,

Respondents in Certiorari and
Defendants.

CIVIL ACTION FILE
NO. 1:21-cv-00018-JRH-BKE

DEFENDANTS' MOTION TO STAY ALL DISCOVERY

COME NOW defendants Augusta-Richmond County, Georgia, Mayor Hardie Davis, Jr., and Commissioners William Fennoy, Dennis Williams, Mary Davis, Sammie Sias, Bobby Williams, Ben Hasan, Sean Frantom, Brandon Garrett, Marion Williams, and John Clarke individually and in their official capacities as members of the Augusta-Richmond County Commission of Commissioners (collectively, "Defendants"), pursuant to Federal Rule of Civil Procedure 26(d) and L.R. 26, files this motion to stay all discovery in this action, including disclosures and planning conferences pursuant to Fed. R. Civ. P. 26 and L.R. 26, pending the Court's consideration of and ruling on Defendants' motion to dismiss.

Defendants have contemporaneously filed a memorandum of law in support of this motion. For the reasons more fully set forth in the accompanying brief, Defendants' motion should be granted.

This 10th day of February, 2021.

FREEMAN MATHIS & GARY, LLP

/s/ Dana K. Maine

Dana K. Maine
Georgia Bar No. 466580
dmaine@fmglaw.com
Jacob W. Loken
Georgia Bar No. 200193
jloken@fmglaw.com

Attorneys for Defendants

100 Galleria Parkway, Suite 1600
Atlanta, GA 30339-5948
(770) 818-0000 (telephone)
(770) 937-9960 (facsimile)

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically submitted the foregoing **DEFENDANTS' MOTION TO STAY ALL DISCOVERY** to the Clerk of Court using the CM/ECF system which will automatically send electronic mail notification of such filing to counsel of record who are CM/ECF system participants:

Christopher A. Cosper
HULL BARRETT, P.C.
801 Broad Street, Suite 700
Augusta, Georgia 30901

This 10th day of February, 2021.

/s/ Dana K. Maine
Dana K. Maine
Georgia Bar No. 466580
dmaine@fmglaw.com

Attorney for Defendants

FREEMAN MATHIS & GARY, LLP
100 Galleria Parkway
Suite 1600
Atlanta, Georgia 30339-5948
(770) 818-0000 (telephone)
(770) 937-9960 (facsimile)
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